

Dear Members of the European Parliament,

In November 2023, the EU Commission adopted Projects of Common and Mutual Interest<sup>1</sup>(PCI list) under the revised Trans-European Networks for Energy Regulation (TEN-E) Regulation<sup>2</sup>.

While gas infrastructure is no longer an eligible category under the revised TEN-E Regulation, the current **6th PCI list still includes a high number of problematic projects**. These involve for example two mega fossil gas pipelines and large, costly hydrogen and carbon capture and storage (CCS) infrastructure projects which are promoted by and benefit the fossil fuel industry.

**These projects risk actively undermining the urgently needed just transition and equally undermining real ambitious emission reduction efforts. We thus urge you to reject the PCI list in its current state by supporting the PCI list objection.** The PCI list must only promote projects that are in line with climate targets, such as a call for climate neutrality by 2040, and urgently needed climate action, and not those which ultimately benefit polluters.

Costly energy megaprojects, almost entirely put forward by the fossil fuel industry which lack proof for actual life-cycle energy emissions reduction, should not get priority status and procedural and financial support by the EU. **These projects risk becoming stranded assets while helping the fossil fuel industry to stay rich by selling false solutions.** Amidst an ongoing cost of living crisis and a growing threat of climate collapse, it is an **alarming signal to greenlight problematic energy projects on the PCI list. We urge you to act in the common interest of Europeans, and not in the vested interest of polluters.** Please reject the 6th list in its current form!

Our specific concerns include:

- **Fossil gas:** The draft list contains **two highly contested mega fossil gas projects**. The EastMed pipeline which aims to transport fossil gas to Europe from gas fields in disputed waters and a region ridden with geopolitical tensions including the impacts of the war in the Middle East. This expensive pipe, planned to be one of the the deepest underwater pipelines ever laid<sup>3</sup>, will mean **more new gas extraction, an activity**

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<sup>1</sup> PCIs and PMIs are large energy projects awarded with top EU priority status. They are projects deemed in highest EU priority and they can benefit from accelerated permitting procedures as well as from subsidies. [https://ec.europa.eu/commission/presscorner/detail/en/qanda\\_23\\_6048](https://ec.europa.eu/commission/presscorner/detail/en/qanda_23_6048)

<sup>2</sup> Trans-European Networks for Energy Regulation (TEN-E) [https://energy.ec.europa.eu/topics/infrastructure/projects-common-interest/selection-process\\_en](https://energy.ec.europa.eu/topics/infrastructure/projects-common-interest/selection-process_en)

<sup>3</sup> <https://www.politico.eu/article/eastmed-a-pipeline-project-that-ran-afoul-of-geopolitics-and-green-policies/>

clearly advised against by the IEA<sup>4</sup>, and risks fuelling confrontations even further. The oversized MelitaTransGas pipeline, planned to connect Malta with Sicily, raises serious concerns linked to climate impacts and due to its **links to the person standing accused of murdering journalist and anti-corruption activist Daphne Galizia Caruana**.<sup>5</sup>

- **Hydrogen:** There are 68 large-scale, cross border **hydrogen projects on the PCI list, entirely submitted by fossil fuel majors like RWE, Shell and BP and the fossil gas transport industry**, the European Network of Gas Transmission System Operators' (ENTSO-G). While two-thirds of these projects have construction costs exceeding €50 billion<sup>6</sup>, the costs of the remaining third have not been disclosed. Thus, all 68 hydrogen projects' construction and operation costs (over 20 years) could exceed a total of €100 billion or more.<sup>7</sup> While many of these projects claim to transport fossil based hydrogen<sup>8</sup>, **no holistic climate impact assessment** has been carried out. Also, **no profound assessments on the availability of hydrogen and infrastructure implications for priority use for hydrogen have been carried out**, raising doubts about the need for these costly projects. An undifferentiated approach to building a large hydrogen network risks making **consumers pay for an unneeded, oversized grid at times when many Europeans already struggle with their energy bills**. This could also be the case with the **H2Med hydrogen pipeline cluster**. With estimated costs of €2.5 billion euros, it envisages the transport of hydrogen from the Iberian Peninsula to the center of Europe. It was proposed without a prior study on the prospects for future production and demand of green hydrogen. The project cluster would involve the building of new pipelines and the repurposing of fossil gas infrastructure with environmental and territorial impacts, raising concerns about economic and technical feasibility.
- **Conflict of interest:** Approximately 75% of hydrogen projects submitted for PCI status are promoted by ENTSO-G members, who are part of the fossil gas transport industry. This body has a crucial role in the process of selecting PCIs, creating a worrying conflict of interest.

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<sup>4</sup> <https://www.iea.org/reports/net-zero-by-2050>

<sup>5</sup> <https://timesofmalta.com/articles/view/yorgen-fenech-compilation-evidence-reopens-daphne-murder-case.1068621> and <https://www.theguardian.com/world/2021/nov/21/eu-could-fund-gas-project-linked-to-man-charged-in-maltese-journalist-murder-daphne-caruana-galizia>

<sup>6</sup> Cost data from ENTSO-G' Ten Year Network Development Plan (TYNDP). See 'TYNDP 2022 List of Projects' here: <https://www.entsog.eu/tyndp#entsog-ten-year-network-development-plan-2022><https://www.entsog.eu/tyndp#entsog-ten-year-network-development-plan-2022>

<sup>7</sup> <https://www.foodandwatereurope.org/blogs/list-of-top-priority-hydrogen-infrastructure-considered-in-europes-common-interest-includes-projects-worth-at-least-e50bn/>

<sup>8</sup> This information was submitted by project promoters to the EU commission and published during the public consultation period. The excel file containing this information has been unpublished by the EU Commission [status: 1 February 2024]

- **CO2 transport:** The 6th PCI list contains 14 CO2 network projects to support Carbon Capture and Storage (CCS), a technology plagued by high costs, technological uncertainties and a long history of failed projects<sup>9</sup>. The reliance on techno fixes like CCS has been, and continues to be successfully **used by the fossil fuel industry to protect their dirty business model** while jeopardizing genuine emissions reduction efforts.

Providing accelerated permitting processes and a faster environmental impact assessment and eventually EU tax money to such projects goes against the interest of people and the planet. For all these reasons, we urge you to act to protect our real joint common interest. **Please reject the list by voting for the objection tabled against it on 22 February.**

Kind regards, Frida Kieninger (Food & Water Action Europe) on behalf of:



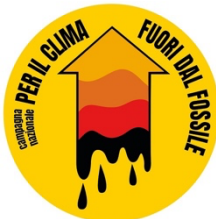
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<sup>9</sup> [https://www.foodandwaterwatch.org/wp-content/uploads/2023/05/ib\\_2003\\_carboncapture-web.pdf](https://www.foodandwaterwatch.org/wp-content/uploads/2023/05/ib_2003_carboncapture-web.pdf)





## Full list of signatories, by organization and country

Food & Water Action Europe	EU
WeSmellGas	Belgium
Environmental Association "Za Zemiata" (Friends of the Earth Bulgaria)	Bulgaria
Ecologistas en Acción	Spain
Gas No Es Solución	Spain
Corporate Europe Observatory	EU
Center for International Environmental Law	Geneva
Comité Ciudadán Emerxencia Ría de Ferrol	Spain
NOAH - Friends of the Earth Denmark	Denmark
Deutsche Umwelthilfe	Germany
Friends of the Earth Malta	Malta

Friends of the Earth Europe	EU
Debt Observatory in Globalisation (ODG)	Catalonia/Spain
Instituto Internacional de Derecho y Medio Ambiente (IIDMA)	Spain
Galiza sen gas	Galicia/Spain
Love Leitrim	Ireland
Natasa Ioannou	Cyprus
Amigos de la Tierra España	Spain
Campagna Nazionale Per il Clima Fuori dal Fossile	Italy
Movimento No TAP/SNAM Brindisi	Italy
Emergenzaclimatica.it	Italy
Coordinamento Ravennate Fuori dal Fossile	Italy
Green Liberty	Latvia
Intersindical Valenciana	València, Spain
Fundación Renovables	Madrid, Spain
Rete Legalità per il clima	Italia
The Daphne Caruana Galizia Foundation	Malta
Gastivists collective	
Zelena akcija/FoE Croatia	Croatia
CEE Bankwatch Network	CEE
Global Witness	UK/Belgium
TerraBlu	Italy
Greenpeace EU	EU
CAN Europe	
Rete NoRigass NoGNL	Italy
Forum Ambientalista	Italy
Comitato Cittadini per l'Ambiente Sulmona	Italy
Coordinamento ravennate Fuori dal Fossile	Italy
Coordinamento No SNAM	Italy
Confederazione Cobas Nazionale	Italy

Bond Beter Leefmilieu	Belgium
Xnet	Spain
Not Here Not Anywhere	Ireland
Fridays for Future Spain	Spain
ReCommon	Italy
Coordinamento Nazionale NoTriv	Italy
European Environmental Bureau	Belgium
urgewald	Germany
Andy Gheorghiu Consulting	Germany/International
PowerShift	Germany
Centre for Transport and Energy	Czech Republic
Earth Systems Association	Malta
Estonian Green Movement	Estonia
ClientEarth	EU
Workshop for All Beings	Poland
Polish Green Network	Poland
Fundacja Instytut na rzecz Ekorozwoju	Poland
ADEPRU Asociación para la defensa paisaje protegido Valle del Río Ungría	Spain
Polski Klub Ekologiczny Okręg Mazowiecki (EN: Polish Ecological Club Mazovian Branch)	Poland
Moviment Graffiti	Malta
Andy Gheorghiu Consulting	Germany
Stowarzyszenie Ekologiczne EKO-UNIA	Poland
Society for the Earth	Poland
Fridays for Future Thessaloniki	Greece
Fossielvrij NL	The Netherlands
GLOBAL 2000	Austria
Fundacja "Rozwój TAK-Odkrywki NIE" (RT-ON)	Poland